

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DIVISION OF MICHIGAN  
SOUTHERN DIVISION**

ALLIANCE ANESTHESIA, PLLC,  
INSIGHT ANESTHESIA, PLLC,  
INTEGRATED HOSPITAL  
SPECIALISTS PC, SOUTHEAST  
MICHIGAN SURGICAL HOSPITAL,  
LLC, D/B/A MICHIGAN SURGICAL  
HOSPITAL, D/B/A INSIGHT SURGICAL  
HOSPITAL (SUSAN WRIGHT),

Plaintiffs,

Case No.:

vs.

Lower Case No.: 24-004209-NF

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY,

Defendant.

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Adam P. Ponto (P74332)  
ELIA & PONTO, PLLC  
Attorneys for Plaintiffs  
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Southfield, MI 48075  
(248) 595-8579  
(248) 595-8729 (fax)  
[aponto@eliaandponto.com](mailto:aponto@eliaandponto.com)

Christopher J. Scott (P65367)  
SLATER SEIBERT  
Attorneys for Defendant  
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Troy, MI 48084  
(248) 509-5642  
(248) 509-5510 (fax)  
[cscott@slaterseibert.com](mailto:cscott@slaterseibert.com)

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**NOTICE OF FILING REMOVAL**

**NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES DISTRICT  
COURT FOR THE EASTERN DISTRICT OF MICHIGAN, SOUTHERN  
DIVISION**

**VERIFICATION**

**CERTIFICATE OF SERVICE**

**NOTICE OF FILING OF REMOVAL**

TO: Clerk of the Court  
Wayne County Circuit Court  
2 N. Woodward Avenue  
Detroit, MI 48226

Adam P. Ponto (P74332)  
ELIA & PONTO, PLLC  
Attorneys for Plaintiffs  
25800 Northwestern Highway,  
Suite 850  
Southfield, MI 48075

PLEASE TAKE NOTICE THAT Defendant has, this day, filed its Notice of Removal, copies of which are attached hereto, in the offices of the Clerk of the United States District Court, Eastern District of Michigan, Southern Division, at Theodore Levin United States Courthouse, 231 W. Lafayette Boulevard, Detroit, MI 48226.

SLATER SEIBERT, PLLC

By: /s/ Christopher J. Scott  
Attorneys for Defendant  
1500 W. Big Beaver Road, Suite 250  
Troy, MI 48084  
Direct Dial: (248) 509-5642  
Email: cscott@slaterseibert.com  
Bar No. P65367

Dated: May 14, 2024

**NOTICE OF REMOVAL PURSUANT TO 28 U.S.C.A. § 1332**

TO: The United States District Court  
Judges of the Above Court

NOW COMES Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by and through its undersigned attorneys, and pursuant to 28 U.S.C. § 1332, 1441 and 1446, herewith file the within Notice of Removal pursuant to said statutes for the following reasons:

1. On **March 20, 2024**, Plaintiffs Alliance Anesthesia, PLLC, Insight Anesthesia, PLLC, Integrated Hospital Specialists, PC, Southeast Michigan Surgical Hospital, LLC, d/b/a Michigan Surgical Hospital, d/b/a Insight Surgical Hospital (Susan Wright), filed a Complaint in the Wayne County Circuit Court, State of Michigan, County of Wayne, which was assigned Case No. 24-004209-NF. (Complaint, Exhibit A).

2. On **April 16, 2024**, State Farm's registered agent, Corporation Service Company, received via certified mail the attached Complaint. (Notice of Service of Process, Exhibit B).

3. In accordance with 28 U.S.C. § 1446(a), copies of all process, pleadings and orders served upon Defendant in the State Court Action – the Summons and Complaint -- are attached hereto as Exhibits A & B.

4. Upon information and belief, and as alleged in the Complaint, Plaintiffs are corporations licensed to do business in the State of Michigan. (Paragraph 1, Exhibit A).

5. State Farm is an Illinois corporation with its principle place of business in Bloomington, Illinois. Therefore, for diversity purposes, State Farm Mutual Automobile Insurance Company is a citizen of the State of Illinois.

6. The amount in controversy exceeds seventy-five thousand dollars (\$75,000.00), exclusive of interest, costs, and attorney fees. Specifically, Plaintiffs claim outstanding medical expenses totaling \$297,238.01 are owed by Defendant.

7. The above-described action is a civil action of which this Court has original jurisdiction under the provisions of Title 28, United States Code, Section 1331, and is one which may be removed to this court by Defendant pursuant to the provisions of Title 28, United States Code, Section 1441 and 1446 in that the Plaintiffs herein commenced an action against Defendant and an actual controversy exists in which the rights and legal relations of the parties must be resolved.

8. The time for filing of this Removal under the statutes of the United States has not expired and is herewith made timely.

9. Written notice of filing of this Removal has been given to all parties as required by law and is attached hereto.

10. A true and correct copy of this Removal is being filed with the Clerk of the Court for the Wayne County Circuit Court, County of Wayne, State of Michigan, as provided for by law.

11. Filed herewith and reference made hereto and made a part hereof, is a true and correct copy of all process and pleadings served upon Defendant.

WHEREFORE, Defendant prays by its undersigned counsel, that removal of the within action be effected from the Wayne County Circuit Court, County of Wayne, State of Michigan, to the United States District Court for the Eastern District of Michigan, Southern Division.

SLATER SEIBERT, PLLC

By: /s/ Christopher J. Scott

Attorneys for Defendant

1500 W. Big Beaver Road, Suite 250

Troy, MI 48084

Direct Dial: (248) 509-5642

Email: cscott@slater.seibert.com

Bar No. P65367

Dated: May 14, 2024

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**VERIFICATION**




CHRISTOPHER J. SCOTT, being first duly sworn, deposes and says that he is the agent and attorney for Defendant, State Farm Mutual Automobile Insurance Company, and that the foregoing Notice of Removal is true in substance and in fact to the best of my knowledge, information, and belief.

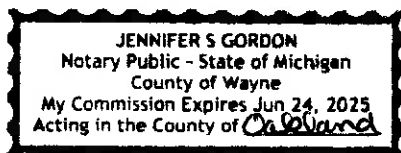
SLATER SEIBERT, PLLC

By:   
Attorneys for Defendant  
1500 W. Big Beaver Road, Suite 250  
Troy, MI 48084  
Direct Dial: (248) 509-5642  
Email: [cscott@slaterseibert.com](mailto:cscott@slaterseibert.com)  
Bar No. P65367

Dated: May 14, 2024

Subscribed and sworn to before me  
on the 14th day of May, 2024.

  
Notary Public Jennifer S. Gordon  
Wayne County, acting in Oakland County, MI  
My commission expires: 06/24/2025



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**CERTIFICATE OF SERVICE**

Jennifer Gordon, an employee with the law firm of SLATER SEIBERT, PLLC being first duly sworn, deposes and says that on the 14th day of May, 2024, she caused a copy of this document to be served upon all parties of record, and that such service was made electronically upon each counsel of record so registered with the United States District Court and via U.S. Mail to any counsel not registered to receive electronic copies from the court, by enclosing same in a sealed envelope with first class postage fully prepaid, addressed to the above, and depositing said envelope and its contents in a receptacle for the US Mail.

By: /s/ Jennifer Gordon  
Slater Seibert, PLLC  
[jgordon@slaterseibert.com](mailto:jgordon@slaterseibert.com)